REMARKS

This response is to the Office Action mailed on January 13, 2000 in the above-referenced case. Claims 1-20 are presented for examination. Regarding the drawings, applicant acknowledges the Examiners advisement that formal drawings will be required when the case is allowed. Regarding the specification, applicant has corrected the abstract of the disclosure to overcome the Examiner's objection. Claims 1 and 11 are objected to by the Examiner because of informalities. Applicant herein corrects the informalities of the claims as kindly suggested by the Examiner.

Claims 6, 11, and 16 are rejected under 35 U.S.C. 112, second paragraph. Claims 1-15 are rejected under 35 U.S.C. 101. Claims 1-2, 6-7, 16-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Syeda-Mahmood (US 5,983,218) hereinafter Syeda, in view of Torres et al. (US 5,897,635) hereinafter Torres. Claims 3-5, 8-10, 11-12, 13-15, and 18-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over syeda, Torres, and further in view of Goetz et al. (US 5,956,729) hereinafter Goetz.

In response to the Office Letter applicant has carefully studied the prior art and the Examiner's rejections and statements. The applicant herein amends the claims to overcome the 101 and 112 rejections presented by the Examiner. Applicant provides arguments and clear reasoning to show the patentable differences between applicant's claimed invention and that of the prior art as cited and applied by the Examiner.

Claim 16 as amended herein recites:

16. (Amended) In a Multimedia Communication Center environment which includes access to and rendering of multimedia files stored in a data repository, a method for assembling an Interactive Multimedia Application (IMA), comprising steps of:

selecting [first selectable] software modules providing functionality for an Interactive Multimedia Application [other than access to, and rendering of the multimedia files;

selecting] including at least one selectable Interactive Multimedia Viewer (IMV) software module having [including] a code set [adapted to access] for accessing and [render] rendering media code from multimedia files stored in a data repository and an editable layer allowing the programmer to program limitations limiting access by the IMV to preselected media files;

editing the editable layer of the at least one IMV; and

joining the selected and edited modules to form the IMA.

16. In a Multimedia Communication Center environment which includes access to and rendering of multimedia files stored in a data repository, a method for assembling an Interactive Multimedia Application (IMA), comprising steps of:

selecting software modules providing functionality for an Interactive Multimedia Application, including at least one selectable Interactive Multimedia Viewer (IMV) software module having a code set for accessing and rendering media code from multimedia files stored in a data repository and an editable layer allowing the programmer to program limitations limiting access by the IMV to preselected media files;

editing the editable layer of the at least one IMV; and

joining the selected and edited modules to form the IMA.

Claim 16 is rejected under 103(a) as being unpatentable over Syeda in view of Torres. The applicant herein amends claim 16 to over come the 101 and 112 rejections. The Examiner states that Syeda discloses selecting first selectable software modules providing functionality for an IMV, (actually, the claim reads IMA) other than access and rendering of the multimedia files (col. 3, lines 61-64). The Examiner states that a computational framework is presented for the design of multimedia databases, methods for index creation on multimedia content , image and video data, to enable the descriptions of the database queries, direct interactive dialog between the WEB client and the multimedia database (col. 4, lines 10-30). The Examiner continues that Syeda discloses the selecting of at least one IMV software module including a code set adapted to access and render media code from multimedia files in a data repository (the invention is part of a WEB based multimedia retrieval system... the design of a WEB sever that can select and coordinate information flow between the data base sites and the user sites (col. 4,lines 4-10).

The reference of Syeda discloses the design and integration of multimedia databases, particularly, the design of multimedia databases for use over networks such as the WWW. Syeda teaches a system including an architecture of a WEB server that addresses site selection problems for multimedia databases under the current networking environment and a complimentary multimedia database design.

Described in the art of Syeda is a meta-server which integrates information from multimedia databases sites for intelligent selection of such sites in response to queries. Syeda teaches the integration of the information presentation capabilities of WEB browsers with the power of multimedia database design.

Syeda teaches that it is the role of the search agent **5** to not only distribute queries to relevant database sites **8** after indexing into the meta-database **4** , but to

also assemble and return the database responses back to the user 6. The art of Syeda specifically states that consistency constraints are not maintained by the search agent 5 among component multimedia databases (col. 6, lines 43-52). The search agent may need to check the consistency of the retrieved information, to eliminate duplication of information. Applicant has studied column 4 lines 4-10 of Syeda, referenced by the Examiner, and fails to find any disclosure remotely relating to the selecting of at least one IMV software module including a code set adapted to access and render media code from multimedia files in a data repository.

Applicant understands Syeda to teach a meta-server (WEB server) creating an internal meta-database which stores simple data namely ranking a list of database sites. The main purpose of the meta-server is to receive a query from a user, discern from the meta-database which database sites the query pertains to, prepare queries for those sites, retrieve information from the sites and present the information to the user.

The Examiner states that Syeda does not disclose the editing of the editable layer of at least one IMV and the joining of selected and edited IMV modules to form the IMA. The Examiner continues to state that Torres discloses the accessing and rendering of media from multimedia files in a data repository (col. 5, lines 10-17) . The Examiner states that Torres discloses the ability to edit the editable layer of at least one IMV (col. 7, lines 50-53), and joining the selected and edited modules to form the IMA (col. 5, lines 28-35).

The invention of Torres is a method for centralized storage of user and application information where user and application information can be added, deleted, modified, updated, and enhanced to customize user computer environments and to improve overall system administration and oversight. Column 7 lines 50-53 is referenced by the Examiner in support of Torres' ability to edit the editable layer of at least one IMV. Column 7 of Torres teaches an

ability of elements of a computer i.e. a mouse, to work with screens of a window. Applicant fails to see how the Window presentation controlling section **30** relates to applicant's IMV. Column 7 lines 41-46 specifically teach that in response to instructions from an operator or user, the window presentation controlling section 30 may (1) change the window-overlapping order to make any desired window active, (2) change the size of each window, (3) move it around on the screen. Column 5, lines 28-34 teaches the ability to add and delete media instances to a media file, for example storing a text version of a file in several different languages. The Examiner states that the file format of Torres allows media instances to be added or deleted to a file...maintain large, complicated multimedia presentations. Applicant respectfully points out that it is the Interactive Multimedia Viewer (IMV) that is edited, not the data file being stored in a multimedia database, as in the art of Torres.

Applicant's claim 16 deals with the ability to edit the IMV which is joined with other selectable models to make the IMA. In the present application, for the first time, a system is provided for quickly and efficiently creating applications for using a multimedia communication center wherein media viewer modules are provided as editable modules wherein access to stored files may be effectively controlled.

Applicant believes the IMA of the present invention is more closely related in the art to the CUI of Torres. The IMA as described in Fig. 10 of applicant's invention is a block diagram illustrating an interactive multimedia application (IMA) tool kit and a diagram of a created IMA application as disclosed in the present invention. An IMA tool kit 225 is provided to an authorized programmer, which may be a knowledge worker, for the purpose of creating special multimedia applications such as an IMA 239 (illustrated within tool kit) for users, wherein users may access and interact with certain pre-selected data for the purpose of reaching decisions and performing certain dedicated

objectives as may be defined by enterprise rules. <u>IMA tool kit 225 contains</u>
<u>executable codes or **modules** represented as building blocks by the inventors.</u>
Among these functional modules are interactive media viewers (IMV's) 227
which are provided and adapted for viewing certain media supported by the
enterprise hosting a communication center. Supported media types may include
but are not limited to telephony (traditional or IP), interactive voice response
(IVR), e-mails, WEB embedded interfaces or forms, faxes, chat programs,
multiparty threaded discussions, etc. IMV's 227 are unique in the fact that they
are dedicated viewers <u>including an interactive layer that enables a programmer to</u>
<u>impose selective control over access to multimedia files in a data repository by the</u>
<u>programmed IMV.</u> An editable software layer inherent to each viewer enables a
programmer to build such constraints and selective functionality into a particular
viewer, and to add the edited viewer to an IMA.

For example, users of the present invention may be assigned an
identification code or number which will also be tagged to all of their stored
interactions as described elsewhere above with reference to Fig. 9. These codes
may be used to associate individuals with limitations and constraints from
viewing media that is not part of their own contact history (for example). Other
limitations or constraints may also be applied to IMV's 227 as may be conceived
and implemented by a programmer such as playing or viewing interactions of
certain dates, playing or viewing interactions about certain subjects, and so on.
<u>In this manner full use may be provided to specialized users without exposing</u>
<u>otherwise sensitive information that is not pertinent to the user or the purpose of</u>
<u>the IMA.</u>

The Examiner states that though both Torres and Syeda do not use the
terms the software modules and Interactive Multimedia Viewer as claimed, it
would have been obvious to one of ordinary skill in the art to have combined
Syeda and Torres since the system of Syeda and Torres show the accessing and

rendering of the multimedia files as well as **editing and joining media files** to create multimedia presentations for forming the Interactive Multimedia Application. The IMA of applicant's invention is for accessing and viewing information from various databases in an enterprise. The IMV of applicant's invention is an editable software module used as a building block to form a IMA. Applicant does not claim editing and joining media files. Applicant edits a software module (IMV) in order to selectively access and render information from the data files in a data base. Applicant is not claiming editing media files in claim 16.

Applicant's claim 16 clearly recites; "selecting software modules providing functionality for an Interactive Multimedia Application, including at least one selectable Interactive Multimedia Viewer (IMV) software module having a code set for accessing and rendering media code from multimedia files stored in a data repository and an editable layer allowing the programmer to program limitations limiting access by the IMV to preselected media files; editing the editable layer of the at least one IMV; and joining the selected and edited modules to form the IMA.

Syeda and Torres, either singly or combined to not teach or remotely suggest the use of the unique software modules including editable layers for obtaining and presenting preselected multimedia information from a multimedia database to a user. The Examiner has managed to establish the existence of multimedia information in a database (syeda), and the ability to present it to a user (Torres). Applicant does not believe a prima facia case of obviousness has been established by the Examiner.

Applicant believes that claim 16 is clearly patentable over the art of Syeda and Torres as argued above. Claims 17-20 are patentable on their own merits, or at least as depending from a patentable claim.

Claim 1 as amended herein recites:

1. In an object-oriented programming interface for use by a programmer in a computer readable medium, a software Interactive Media Viewer (IMV) module, comprising:

a code set adapted to access and render media code from multimedia files stored in a data repository; and

an editable layer allowing the programmer to program selective control of access by the IMV to the multimedia files.

Regarding claim 1, the Examiner states that the IMV recited in claim 1 is disclosed in claim 16 and is therefore rejected under the same rational. As argued extensively on behalf of claim 16 above, the IMV software module including an editable layer allowing the programmer to program selective control of access by the IMV to the multimedia files, is certainly not taught or suggested in the art provided by the Examiner. Applicant believes that claim 1 is patentable over the art of Syeda and Torres. Claims 2-5 are also patentable at least as depended from a patentable claim.

Claim 6 as amended herein recites:

6. A programming application for creating an Interactive Multimedia Application (IMA), in a computer readable medium, which includes access to and rendering of multimedia files stored in a data repository, comprising:

first selectable software modules providing functionality for an Interactive Multimedia Application; and

at least one selectable Interactive Multimedia Viewer (IMV) software module including a code set adapted to access and render media code from multimedia files stored in a data repository and an editable layer allowing [the] a̲ programmer to program selective control of access by the IMV to the multimedia files;

wherein by selecting, including, and editing software modules the programmer is enabled to create the IMA.

Regarding claim 6, the Examiner states that the claim is a programming application to perform the method disclosed in claim 16 and is rejected under the same rational. Applicant believes claim 6 is also patentable as argued on behalf of claim 16. Claims 7-10 are patentable at least as depended from a patentable claim.

Claim 11 as amended herein recites:

11. A multimedia communication center, having a programming application for creating an Interactive Multimedia Application (IMA), in a computer readable medium, comprising:

an access interface for outside communication;

an interface to communication center personnel;

a storage system for recording multimedia transactions in a data repository, the stored transactions characterized by tags representing one or more of date, time, participants, file type, company affiliation of participants, subject or issue, and relationship to other multimedia files; and

a programming application for creating the IMA

which includes access to and rendering of the multimedia files stored in the data

repository;

wherein the programming application is characterized by first selectable

software modules providing functionality for an Interactive Multimedia

Application including at least one selectable Interactive Multimedia Viewer (IMV)

software module including a code set adapted to access and render media code

from multimedia files stored in a data repository and an editable layer allowing

the programmer to program selective control of access by the IMV to the

multimedia files, wherein by selecting, including, and editing software modules

the programmer is enabled to create the IMA.

Claim 11 is rejected under 103(a) as being unpatentable over Syeda, Torres and Goetz. The Examiner states that claim 11 is for a multimedia communication center which includes the limitations of claim 6, the storage system for recording multimedia file (rejected claim 20), and the access interface (Torres, col. 1, lines 39-48; col. 2, lines 5-34), therefore is rejected under the same rational applied to these claims.

Regarding the rejection of claim 20, the Examiner states that Goetz discloses the multimedia files represent multimedia transactions (col. 11, lines 21-26). The Examiner continues to state that Goetz discloses date, time, file type, subject and relationship to other multimedia files (col. 11, lines 61-66); the media request message sent to the multimedia server application,...specifying the desired media type to be produced (col. 12, lines 1-14).

Applicant has read the columns 11 and 12 of Goetz, and does not find the relationship of the disclosure taught in Goetz and the recited ability of applicant's claim 20 (claim 11) wherein the multimedia files stored in the data repository

represent multimedia transactions, and <u>are characterized with tags</u> according to one or more of date, time, participants, file type, company affiliation of participants, subject or issue, and relationship to other multimedia files.

Goetz teaches a method of controlling information flow between a multimedia server application and a multimedia client application. Goetz teaches that multimedia files **850** are accessible at a WEB server by a WEB browser (col. 11, lines 21-26). Goetz teaches that in response to a "go" message the multimedia server application **1040** sends a message to the multimedia client application **1020** specifying, among other things the time of day as determined by the reference clock (col. 11, lines 61-66). Goetz discloses that the multimedia client application **1020** sends a media request message to the multimedia server application **1040** (col. 11 lines 43-45). Goetz discloses that the WEB server application **1040** sends a configuration message to a multimedia client application **1020** specifying among other things, the sizes and relationships of the information to be produced. The client application **1020** uses the configuration information to control its consumption of the information produced, or streamed, by the server. Finally the server application **1040** sends a "go" message to the client application **1020**, indicating the end of the initial interaction. The interaction ends in step **1199**, and the server is ready to begin streaming in the media data from the file (col. 12, lines 1-14).

Applicant fails to see in the "actual" interpretation of the printed word of the disclosure of Goetz a teaching or remote suggestion of a teaching or suggestion as recited in claim 20, wherein the multimedia files stored in the data repository represent multimedia transactions, and are characterized with tags according to one or more of date, time, participants, file type, company affiliation of participants, subject or issue, and relationship to other multimedia files, and wherein IMVs are limited through the editable layer to tags of the multimedia files, as recited in applicant's claimed invention. Goetz clearly teaches that the

server application sends configuration information <u>regarding the relationships of</u> <u>information in the same multimedia file</u> in order to successfully reconstruct the file at the server, as is well known in the art. The multimedia files in the art of Goetz are not tagged as claimed in applicant's invention. Goetz does not enable at least one selectable Interactive Multimedia Viewer (IMV) software module including a code set adapted to access and render media code from multimedia files stored in a data repository and an editable layer allowing the programmer to program selective control of access by the IMV to the multimedia files, wherein by selecting, including, and editing software modules the programmer is enabled to create the IMA, as recited in applicant's claimed invention.

There is absolutely no disclosure in Goetz of tagging a multimedia file as claimed in applicant's invention. Goetz teaches that the output of the packetizer is written to multimedia file **850** , such that each media type uses a contiguous portion of body **120** to contain the media block. The multimedia file **850** is easily modified to add or delete media blocks, for example, to add additional languages, data rates or background music (column 10). When "media types" are requested in the art of Goetz (col. 11 lines 43-45) it is a request for media versions, or blocks of the same file. This does not read on applicant's claimed invention. As argued above, on behalf of claim 16, Syeda and Torres do not teach the structure and functions of the IMV and IMA as claimed. Goetz as argued above does not teach a selectable Interactive Multimedia Viewer (IMV) software module <u>including a code set adapted to access and render media code from</u> <u>multimedia files stored in a data repository</u> and an editable layer allowing the programmer to program selective control of access by the IMV to the multimedia files.

The art provided by the Examiner shows a part of the basic components known in the art, but the art simply fails to teach or suggest a function or combination of the art to substantiate a prima facia case of obviousness rejecting

applicant's invention. The unique structuring of Interactive Multimedia Applications using software modules as building blocks for the IMA wherein at least one of the the software modules is a viewer which is editable to limit it's ability to access and render multimedia files from a multimedia database is a unique and patentable invention certainly not shown or suggested in the art provided by the Examiner. Applicant believes claim 11 is clearly patentable over the art provided by the Examiner. Claims 12-15 are also patentable on their own merits or at least as depended from a patentable claim.

As all of the claims standing for examination as amended have been shown to be patentable over the art of record, applicant respectfully requests reconsideration and that the present case be passed quickly to issue. If there are any time extensions due beyond any extension requested and paid with this amendment, such extensions are hereby requested. If there are any fees due beyond any fees paid with the present amendment, such fees are authorized to be deducted from deposit account 50-0534.

Respectfully Submitted,
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by_____
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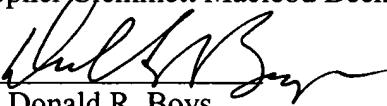
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